



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 25, 2007

Reply To

Attn Of: ETPA-088

Ref: 06-077-AFS

Keith Dimmett
Cascade Ranger District
P.O. Box 696
Cascade, ID 83511

Dear Mr. Dimmett:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Spruce Creek Project** (CEQ No. 20070176) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS documents environmental impacts for timber harvest, temporary road construction, road maintenance, thinning of sub-merchantable trees, and enhancement of aspen and whitebark pine on 2,687 acres in the Cascade Ranger District of the Boise National Forest in Valley County, Idaho. The silviculture prescriptions will include clearcut with reserve trees, commercial thinning, improvement cut, irregular shelterwood, individual tree selection, sanitation and salvage, and thinning of sub-merchantable trees.

The EIS evaluates three action alternatives to achieve the project's eight primary objectives. Alternative C, the preferred alternative would maintain the integrity of all modeled flammulated owl home ranges and still meet the identified purpose and need to a high degree. Alternative D would also maintain the integrity of all modeled flammulated owl home ranges, with emphasis on mitigating effects on pileated woodpeckers. However, considerably fewer acres would be treated and the project objectives would not be met to the same degree as the preferred alternative.

The Forest Service is to be congratulated for the restorative Best Management Practices (BMPs) that have been implemented in the Gold Fork River area to reduce management-related sediment issues in this Water Quality Limited Waterbody. These activities resulted in meeting the sediment and phosphorous Total Maximum Daily Load (TMDL) allocations for nonpoint sources. In addition, the proposed activities for the Spruce Creek Project will continue to be consistent with the TMDL and provide additional reductions in sediment and reduce the potential for road prism failures in the drainage. We support the actions that will be taken to stabilize

thecutslope failure on the #498 road and the efforts to address the impacts related to the irrigation drainage downstream from the project area.

We have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the draft EIS based on concerns about potential effects of thinning activities in the Riparian Conservation Areas (RCA), and Coarse Woody Debris (CWD) recruitment. This rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

The three action alternatives would include thinning of sub-merchantable trees (trees less than 8 inches dbh) on 615 acres to stocking levels ranging from 90 to 135 trees per acre. Trees selected for thinning would generally be 4 to 8 feet in height with an emphasis on retaining disease-free trees with the fullest crowns and occupying the most advantageous position in the understory's canopy layer. The EIS discusses the species that would be favored for retention, the projections for understory and canopy composition and the opportunities for large woody debris recruitment. However, the EIS does not discuss actions that will be taken to assure that merchantable timber will not be removed from the RCA. The removal of larger trees could result in reduced shade and increases in stream temperatures. The EIS should discuss actions that will be taken to assure that thinning in RCA is limited to trees less than 8 inch dbh.

Table 3-17 presents the existing Coarse Woody Debris (CWD) within the project area. While many of the potential vegetation groups (PVG) dry weight indicators are met, most of the PVGs do not currently meet the percent greater than 15 inches indicator. The EIS discusses how each of the silviculture activities will impact CWD recruitment, however, it does not discuss how these activities will contribute to meeting the CWD indicators. We recommend that the EIS include a table similar to Table 3-17 that displays the expected CWD for each indicator in all PVGs.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these comments in detail, please contact Mike Letourneau at (206) 553-6382 or myself at (206) 553-1601.

Sincerely,

//s//

Christine Reichgott, Manager
NEPA Review Unit

Enclosure

CC: J. Werntz, EPA-IOO
L. Woodruff, EPA-IOO